

ABELSON & TRUESDALE, LLC

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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In Re:

ROBERT K. BRYANT
LYNN E. BRYANT

Debtors

Case No. 12-3383 (MBK)

Chapter 13

**CROSS MOTION FOR VIOLATION OF
AUTOMATIC STAY PER 11 U.S.C. § 362(a)
AND FOR DAMAGES PURSUANT TO
11 U.S.C. 362(k)**

Hearing Date: **May 10, 2016 @ 9:00 A.M.**

To: Clerk, United States Bankruptcy Court
United States Bankruptcy Court
402 E. State Street
Trenton, New Jersey 08608

Albert Russo, Trustee
CN 4853
Trenton, NJ 08650

Jeanette Frankenberg, Esq.
Stern Lavinthal & Frankenberg LLC
105 Eisenhower Pkwy
Suite 302
Roseland, NJ 07068

Seterus, Inc.
4460 44th Street SE
Suite D
Grand Rapids, MI 49512

PLEASE TAKE NOTICE that on May 10, 2016 at 9:00 in the forenoon, or as soon as counsel may be heard, the undersigned attorney for the Debtors, Robert & Lynn Bryant will move before the UNITED STATES BANKRUPTCY COURT, Honorable Michael B. Kaplan, presiding, 402 E. State Street, TRENTON, NEW JERSEY, 08608 for an Order Enforcing the

automatic stay, denying the Creditor's Motion for Relief from the Automatic Stay, and an Order awarding Debtors damages per 11 U.S.C. § 362(k)

PLEASE TAKE FURTHER NOTICE that Debtor shall rely upon the attached certification in support of the application and that pursuant to Local Rule 9013-1, it is submitted that no brief is necessary as issues presented are clear and concise, oral argument is not requested and a proposed form of order is submitted herewith.

/s/ Bruce C. Truesdale

BRUCE C. TRUESDALE, ESQ.
Attorney for Debtors

Dated: May 3, 2016